

Zach Intrater, being duly sworn, deposes and says:

1. I am an attorney licensed in the state of New York.
2. I currently am employed as Of Counsel at Brafman & Associates, P.C., a law firm in New York.
3. I am familiar with the facts set forth in this affidavit.
4. In or around May 2022, my firm was approached by VTB Bank (PJSC) to represent VTB Bank (PJSC) in a civil action currently pending in the United States District Court for the Southern District of New York, captioned Schansman et al. v. Sberbank of Russia PJSC et al., Civ. A. No. 19-cv-02985 (ALC) (GWG).
5. Our firm has been engaged in discussions with VTB Bank (PJSC) to come to an agreement regarding representation. We have agreed to terms for that representation, which includes the payment of retainer.
6. Our firm has also engaged in discussions with OFAC, seeking OFAC's guidance for our their firm to accept this representation and to accept funds in exchange for the firm's legal services.
7. OFAC has indicated that, although it does not approve or disapprove of individual scenarios, that while VTB Bank (PJSC) is a blocked entity pursuant to federal regulations, there is a general license that permits the payment of U.S.-based attorneys in exchange for legal services provided to a blocked entity in a pending matter in United States courts.
8. Our firm maintains a bank account at a financial institution in New York.
9. Our firm has engaged in discussions with the relationship manager at that financial institution, which so far have resulted in the financial institution being unwilling to receive funds originating from within the Russian Federation. Our firm is still in discussions with that financial institution, which we believe may result in the financial institution agreeing to receive the payment.

10. We have also, simultaneously, begun the process of finding a different financial institution that would accept the payment.



Zach Intrater, Esq.
Of Counsel
Brafman & Associates, P.C.